

REMARKS

Applicants submit this Amendment and Request for Continued Examination in reply to the Office Action mailed September 16, 2006.

As an initial matter, Applicants appreciate the Examiner's indication of the allowability of the subject matter of claims 16-18 and 20. At least because Applicants believe that the subject matter of as-amended independent claim 2, from which claims 16-18 and 20 depend, is allowable over the cited references, Applicants have not rewritten any of dependent claims 16-18 and 20 into independent form at this time.

By this Amendment, Applicants have cancelled claims 6-12, without prejudice or disclaimer, and amended claims 2, 3, 5, 15, and 16. The originally-filed specification, drawings, and claims fully support the subject matter of amended claims 2, 3, 5, 15, and 16. No new matter has been introduced.

Before entry of this Amendment, claims 2-20 were pending in this application, with claims 6-12 having been withdrawn from consideration. After entry of this Amendment, claims 2-5 and 13-20 are pending in this application. Claim 1 is the sole independent claims.

On pages 2-3 of the Office Action, claims 1-5, 13, 14, and 19¹ were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,038,050 to Minoura et al. ("Minoura"). Applicants respectfully traverse this rejection. For anticipation under 35 U.S.C. §102, the reference must teach every aspect of the claimed invention either explicitly or implicitly. M.P.E.P. 706.02. Because Minoura does not teach every aspect

of claims 2-5, 13, 14, and 16-20 either alone or in combination with the other aspects of the claimed invention, Minoura does not anticipate any of those claims.

Minoura does not disclose or suggest the invention claimed in as-amended independent claim 2. For example, independent claim 2 recites a relay unit including, among other aspects, "wherein each of said relays includes a pair of switch connecting bus bars between which a relay switch element is intervened and a pair of coil connecting bus bars between which a relay coil element is intervened, wherein one of said switch connecting bus bars is formed with a downstream fuse connector portion to which each of said fuses is electrically coupled and a relay terminal configured to be electrically coupled to a connector." Minoura does not disclose at least these aspects of the claimed invention either alone or in combination with the other aspects of the claimed invention.

Specifically, Fig. 4 of Minoura only schematically or topologically discloses the relationship between busbar 15, junction box 12, and fuselinks 20, and not the physical structure of the relay unit. Accordingly, Minoura cannot disclose physical structures, or any relationships between them, such as switch connecting bus bars and coil connecting bus bars as set forth in as-amended independent claims 2. Moreover, a comparison of Fig. 3 of Minoura and Fig. 10 of the specification, for example, discloses different physical structures.

¹ Claims 16-20 are listed as being rejected, however, the subject matter of claims 16-18 and 20 were not addressed on the merits in the rejection and were later indicated as containing allowable subject matter.

Accordingly, because Minoura does not disclose every aspect of the invention either alone or in combination with the other aspects of the claimed invention, Applicants respectfully request withdrawal of the Section 102(b) rejection.

On pages 5-6 of the Office Action, claim 15 was rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,038,050 to Minoura et al. ("Minoura"). Applicants respectfully traverse this rejection for the same reasons as set forth on pages 9-11 of the Amendment filed December 6, 2004 and page 9 of the Amendment filed June 24, 2005.

Accordingly, Applicants again respectfully request withdrawal of the Section 103(a) rejection based on Minoura.

Applicants further submit that claims 3-5 and 13-20 depend from independent claim 2, and are therefore allowable for at least the same reasons that independent claim 2 is allowable. In addition, at least some of the dependent claims recite unique combinations that are neither taught nor suggested by Minoura and therefore at least some also are separately patentable.

The Office Action contains characterizations of the claims and the related art with which Applicants do not necessarily agree. Unless expressly noted otherwise, Applicants decline to subscribe to any statement or characterization in the Office Action.

In discussing the specification, claims, abstract, and drawings in this Amendment it is to be understood that Applicants are in no way intending to limit the scope of the claims to any exemplary embodiments described in the specification or abstract and/or shown in the drawings. Rather, Applicants are entitled to have the claims interpreted

broadly, to the maximum extent permitted by statute, regulation, and applicable case law.

Please grant any extensions of time required to enter this Amendment and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: February 13, 2006

By: 

Michael W. Kim
Reg. No. 51,880